

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: WELDING FUME PRODUCTS
LIABILITY LITIGATION

CASE NO. 1:07-wf-17089

This pleading applies to the following case:

MDL DOCKET NO. 1535

ERNEST S. and LORETTA JANE MAEMORI v.
AIR LIQUIDE AMERICA
CORPORATION, a Delaware Corporation,
Individually, and as successor to BIG THREE
INDUSTRIES, INC.; ET AL.

JUDGE O'MALLEY

RENEWED MOTION FOR REMAND TO STATE COURT

Plaintiffs, ERNEST S. and LORETTA JANE MAEMORI, by and through
undersigned counsel, file this Renewed Motion for Remand to State Court.

Plaintiffs' Motion for Remand to State Court, attached hereto as Exhibit A, and
Memorandum in Support of Plaintiffs' Motion for Remand to State Court, attached
hereto as Exhibit B, were filed in the United States District Court for the State of Hawaii
on July 11, 2007. Plaintiffs hereby request that said Motion for Remand to State Court be
renewed in the United States District Court for the Northern District Court of Ohio,
where Plaintiffs' case in the above-referenced cause is currently pending.

Respectfully submitted,

A handwritten signature in black ink, reading "D. John Neeze, Jr." in a cursive script.

D. JOHN NEESE, JR.
Texas Bar No. 24002678
WILLIAMS KHERKHER HART BOUNDAS, L.L.P.
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Houston, Texas 77017
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CERTIFICATE OF SERVICE

I hereby certify that on December 21, 2007 a true copy of the foregoing was filed electronically. Notice of this filing was sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

Respectfully submitted,

A handwritten signature in black ink, reading "D. John Neeze, Jr." in a cursive script.

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